

## UNITED STATES DISTRICT COURT

for the

Western District of TexasUnited States of America  
v.

Case No. SA-21-MJ-00105

William Wesley Sims

*Defendant(s)*

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 01/27/2021 in the county of Comal in the  
Western District of Texas, the defendant(s) violated:*Code Section**Offense Description*

18 U.S.C. 2252A(a)(2)

Receipt of Child Pornography

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.

Larry Baker

Digitally signed by Larry Baker  
Date: 2021.01.29 08:56:50 -06'00'*Complainant's signature*

Larry Baker, FBI SA

*Printed name and title*

- ☐
- Sworn to before me and signed in my presence.
- 
- ☐
- Sworn to telephonically and signed electronically.

*Judge's signature*Date: 01/29/2021City and state: San Antonio, Texas

Richard Farrer, United States Magistrate Judge

*Printed name and title*

Penalties: Mandatory Minimum 5 years imprisonment; Maximum 20 years imprisonment; Lifetime Supervised Release; \$250,000 fine, \$100 Special Assessment; \$5,000 JVT A Assessment; Up to \$35,000 18 USC 2259A Assessment; Restitution; Forfeiture; and Registration as Sex Offender.

**COMPLAINT AFFIDAVIT**

I, Larry Baker, being duly sworn, depose and state that:

1. I am a Special Agent ("SA") of the Federal Bureau of Investigation ("FBI") and have been so employed since January 1999. I am currently assigned to the San Antonio Division of the FBI. I am assigned to the Violent Crimes against Children Section and as such, I investigate crimes against children, including the trafficking and possession of child pornography and the sexual exploitation of children. I have received particularized training in the investigation of computer-related crimes, social networking, and online (i.e. Internet based) crimes against children.

2. This affidavit is being submitted in support of an Application for a Criminal Complaint for **WILLIAM WESLEY SIMS**.

3. FBI San Antonio received information on January 27, 2021 that an individual who had been making child exploitation material available via Peer to Peer (P2P) software in a variety of cities including Amarillo, Farwell, and New Braunfels, Texas.

4. FBI SA Hendricks was using an online Peer to Peer (P2P) investigative software to investigate and identify persons sharing and/or distributing child pornography. SA Hendricks discovered IP address 205.201.64.97 that geolocated to Amarillo, Texas, and IP address 74.50.133.72 that geolocated to Farwell, Texas that were sharing at least one or more files containing child pornography. IP address 205.201.64.97 was serviced by Suddenlink Communications. IP address 74.50.133.72 was serviced by Plateau Communications. SA Hendricks served subpoenas to both companies requesting subscriber information. Suddenlink Communications advised IP address 205.201.64.97 came back to the TA Travel Center in Amarillo, Texas. Plateau Communications advised that IP address 74.50.133.72 came back to the TA Travel Center in Santa Rosa, New Mexico.

5. SA Hendricks conducted a search using the Globally Unique Identifiers (GUID) identified from the downloads captured from TA Travel Center IP addresses 205.201.64.97 and 74.50.133.72. The search revealed the GUIDs accessed multiple IP addresses across the country for several years beginning as early as 2013. SA Hendricks conducted online searches of the IP addresses which revealed most of the IP addresses returning to TA Travel Centers throughout the country.

6. SA Hendricks contacted the TA Travel Center in Amarillo, Texas. Management indicated the TA Travel Center had courtesy WiFi and WiFi service available for purchase. Further, Management indicated the courtesy WiFi signal was only for inside the restaurant and would not allow for large downloads or streaming.

7. SA Hendricks was eventually directed to Interstate Telecommunications (ITI) who manages the Internet service provided at TA Travel Centers. A subpoena served on Interstate Telecommunications (ITI) revealed various known TA Travel Center IP addresses that were used at specific dates and times by the same GUID in connection with the receipt and distribution of child exploitation material.

8. ITI identified the TA Travel Center account accessing the various known TA Travel Center IP addresses was a prepaid login PIN number purchased with a network card at TA Travel Centers. Further, ITI identified the same login PIN number being used by the various IP addresses provided by SA Hendricks used to traffic in child exploitation material.

9. On January 26, 2021, SA Hendricks conducted a search for the previously identified GUIDs connected to the trafficking of child exploitation material. The search showed that the two previously identified GUIDs were connected to the P2P file sharing network using IP address 98.6.47.43. That specific IP address resolves to the TA Travel Center, 4817 N Interstate 35, New Braunfels, Texas.

10. On January 27, 2021, ITI confirmed that two different devices were currently connected to IP 98.6.47.43, located at the TA Travel Center in New Braunfels, Texas, using the same login PIN number mentioned above.

11. On January 28, 2021, that login PIN was identified using an IP address at a truck stop in Hillsboro, Texas, as of approximately 8:30 a.m. San Antonio FBI agents arrived in Hillsboro and were able to identify WILLIAM WESLEY SIMS as the individual using the above login PIN and IP 98.6.47.43 at the TA Travel Center in New Braunfels to obtain child exploitation material on January 27, 2021. SIMS voluntarily provided consent for the search of his two HP laptop computers he had with him in his truck.

12. SIMS agreed to speak with agents and admitted using the two HP laptop computers, one red in color and one black in color to download child exploitation material depicting minor children engaged in sexually explicit conduct through the WiFi at the TA Travel Center in New Braunfels, Texas on January 27, 2021 and January 28, 2021. SIMS stated he knew that by using P2P software, he was also sharing child exploitation material with others. SIMS explained to agents how he buys network access using a PIN code at the various truck stops and uses them to connect to the internet in order to download child exploitation material.

13. A preliminary review of the red HP laptop computer revealed images and videos contained in the directory [root]/Users/thayb/Downloads that are consistent with child pornography, to include a video file, approximately 3 minutes and 52 seconds in length depicting a prepubescent female child, nude from the waist down, being penetrated anally by an adult male. This file has a file creation date of January 27, 2021 at 1:39:55AM.

14. Based on the aforementioned facts, your Affiant respectfully submits that there is probable cause to believe that on or about January 27, 2021, within the Western District of Texas, WILLIAM WESLEY SIMS, did knowingly receive child pornography using any means or facility of interstate and foreign commerce and that has been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, in violation of 18 U.S.C. § 2252A(a)(2).

FURTHER AFFIANT SAYETH NOT,

*Larry Baker*

Special Agent Larry Baker, FBI  
San Antonio, Texas

SWORN TO BEFORE ME THIS  
DAY OF 01/29/2021

*RFBZ*

THE HONORABLE RICHARD FARRER  
UNITED STATES MAGISTRATE JUDGE